

TrustLine Deep Alpha AIF Policy on Stewardship Responsibilities

The Policy on discharge of stewardship responsibilities ('Policy') sets out the framework and guidelines on discharge of the stewardship responsibilities of TrustLine Deep Alpha AIF (the Fund) in accordance with Guidelines on Stewardship Code issued by SEBI vide Circular No. CIR/CFD/CMD1/168/2019 dated 24th December 2019.

The Policy defines the stewardship responsibilities to be undertaken by the Fund and processes that the Fund intends to follow in order to safeguard the interests of its investors.

The stewardship principles laid down by the SEBI are:

Principle 1 - Institutional Investors should formulate a policy on the discharge of their stewardship responsibilities and publicly disclose it.

Principle 2 - Institutional Investors should have a clear policy on how they manage conflicts of interest in fulfilling their stewardship responsibilities and publicly disclose it.

Principle 3 - Institutional Investors should monitor their investee companies.

Principle 4 - Institutional Investors should have a clear policy on intervention in their investee companies. Institutional Investors should have a clear policy for collaboration with other institutional investors, where required, to preserve the interests of the ultimate investors, which should be disclosed.

Principle 5 - Institutional Investors should have a clear policy on voting and disclosure of voting activity.

Principle 6 - Institutional Investors should report periodically on their stewardship activities.

Principle 1 - Stewardship Responsibilities

Our Fund invests in listed equities of various investee companies to enhance the portfolio returns. This policy aims to define the minimum level of engagement and monitoring required to be maintained with the investee companies. The Fund will endeavour to engage actively with all investee companies in which the Fund holds more than 1% of outstanding equity shares.

Principle 2 - Managing Conflict of Interest

All Investment Committee members and Investment Team members involved in managing the investment portfolio will strive to: Avoid conflict of interest. Disclose any conflict of interest and adequately manage the conflict by ensuring that the disclosing member is not involved in the decision-making process. Voting decisions will be taken to protect the interests of the Organisation.

Principle 3 and 4 - Monitoring of Investee Companies and Policy on Intervention

Active monitoring of investee companies through internal and external research will be part of the duties of the Investment team. The Investment team will be responsible for analysing publicly available information about investee companies and by attending conference calls held by the management to ascertain the strategy, performance, risk assessment, capital structure and corporate governance of the investee companies. Intervention regarding issues as identified by the Investment team will be taken up through direct one on one discussions in investee companies in which the Fund holds more than 1% of the outstanding equity shares. On a case to case basis, the Fund shall collaborate with other Institutional Investors to ensure that the Fund's interests in the investee companies stand protected.

Principle 5 - Voting and disclosure of voting activity

We believe high standards of corporate governance help companies deliver sustainable returns to shareholders. In our dealings with investee companies, and in our voting, we encourage adherence to best practice in corporate governance. Our voting aims to protect investors' interests and foster good practice.

The key areas that the Fund seeks to vote on will be related to corporate governance and matters related to future prospects of the investee companies including Director appointments and compensation, corporate restructuring and related party transactions. The Fund may also consider additional factors, including recommendations made by any proxy advisory firms while voting.

The Fund shall maintain a record of its voting on investee companies' resolutions.

Principle 6 - Disclosure and Reporting Stewardship Policy

The Fund shall upload the Stewardship Policy on its website. The Annual Letter to the investors may provide the stewardship activities that were carried out in that particular year.